

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JULIE ELLEN WARTLUFT F/K/A JULIE  
ELLEN BARTELS AND FREDERICK L.  
BARTELS, JR., Individually and as  
Administrators of the Estate of Abrielle Kira  
Bartels, Deceased,

Plaintiffs,

vs.

MILTON HERSHEY SCHOOL,  
and  
THE HERSHEY TRUST COMPANY, AS  
TRUSTEE OF THE MILTON HERSHEY  
SCHOOL TRUST,

Defendants.

C.A. NO.:  
1:16-cv-02145-CCC

(CONNER, C.J.)

**FILED**  
HARRISBURG, PA

SEP 14 2018

PER

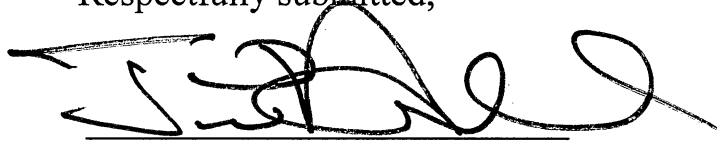
DEPUTY CLERK

**DEFENDANTS' MOTION FOR LEAVE TO  
FILE DOCUMENTS UNDER SEAL**

Defendants, Milton Hershey School, and The Hershey Trust Company ("HTC"), as Trustee of the Milton Hershey School Trust (collectively "Defendants"), by and through their undersigned counsel, hereby move under Local Rule 5.8 to file their Statement of Appeal, Brief in Support of their Statement of Appeal, and Exhibits under seal. The documents which Defendants seek to file under seal are provided at Exhibit "A" in Defendants' sealed envelope marked "Documents pending sealing decision" provided to the Clerk contemporaneous with the filing of this Motion. Included in that sealed envelope is a Proposed Order granting Defendants' Motion to Seal and Defendants'

Memorandum of Law in Support of Their Motion to Seal. For all the reasons set forth in Defendants' Memorandum of Law in Support of this Motion, which is incorporated herein by reference, this Court should grant Defendants' motion to file the documents under seal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jarad W. Handelman', written over a horizontal line.

Jarad W. Handelman, Esquire  
(PA 82629)

Kyle M. Elliott, Esquire  
(PA 306836)

Elliott Greenleaf, P.C.

17 N. Second Street, Suite 1420

Harrisburg, PA 17101

717.307.2600 (phone) / 717.307.2060 (fax)

215.977.1000 (phone) / 215.977.1099 (fax)

jwh@elliottgreenleaf.com

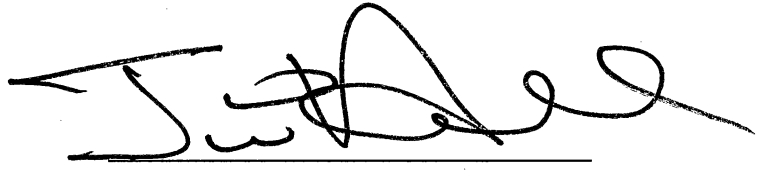
kme@elliottgreenleaf.com

*Counsel for Defendants*

Date: September 14, 2018

**CERTIFICATE OF NON-CONCURRENCE**

I, undersigned counsel, certify that counsel for PHC does not concur with the Motion. I also certify that I contacted counsel for Plaintiffs seeking concurrence with the Motion, and opposing counsel has not responded. Accordingly, Plaintiffs do not concur with the Motion.

A handwritten signature in black ink, appearing to read 'Jarad W. Handelman', written over a horizontal line.

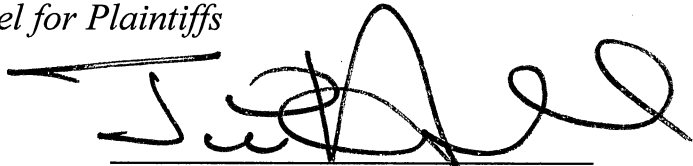
Jarad W. Handelman, Esquire

Dated: September 14, 2018

**CERTIFICATE OF SERVICE**

I, Jarad W. Handelman, Esquire, hereby certify that I caused the foregoing to be served via first class mail and electronic mail upon all counsel of record, including:

Gregory F. Cirillo, Esquire  
John J. Higson, Esquire  
Dilworth Paxson LLP  
1500 Market Street, Suite 3500E  
Philadelphia, PA 19102  
215.575.7000 (phone)  
gcirillo@dilworthlaw.com  
jhigson@dilworthlaw.com  
*Counsel for Plaintiffs*

A handwritten signature in black ink, appearing to read 'Jarad W. Handelman', is written over a horizontal line.

Jarad W. Handelman, Esquire

Dated: September 14, 2018